

**Function:****OR-3 Percent Rejects****Definition:**

**Percent Rejects:** The percent of orders received (including supplements and re-submissions) by Bell Atlantic that are rejected or queried. (Orders that are queried are considered rejected.) Orders are rejected due to omission or error of required order information.

The percent reject measure is reported against all order submitted transactions processed in the Ordering Interface (DCAS or Request Manager), not just those with associated CRIS completions.

**% Resubmission Rejection:** The percent of PONs resubmitted at Bell Atlantic's request in relation to a Trouble Ticket which are rejected by Bell Atlantic's ordering systems and interfaces as being duplicative of PONs already in Bell Atlantic's systems.

Note: Edit Rejects – Orders failing "Basic front-end edits"<sup>1</sup> are not placed on Completed PON Master File.

**Exclusions:**

- BA Test Orders

**Performance Standard:**

OR-3-02: > 5% threshold for Special Provision.

**Report Dimensions****Company:**

- CLEC Aggregate
- CLEC Specific

**Geography:**

- State

**Sub-Metrics****Products**

- EDI Orders

**OR-3-02****% Resubmission Rejection****Calculation****Numerator**

Total PONs resubmitted at Bell Atlantic's request in relation to a Trouble Ticket that are rejected by Bell Atlantic's systems as duplicative of PONs already in Bell Atlantic's systems.

**Denominator**

Total PONs resubmitted at Bell Atlantic's request in relation to a Trouble Ticket.

<sup>1</sup> Basic front-end edits – see Glossary to Carrier-to-Carrier Guidelines in Case 97-C-0139.

### OR-7 % Order Confirmation/Rejects Sent Within 3 Business Days

The percent of Resale POTS and UNE Platform LSRs confirmed or rejected by BA within 3 business days of receipt as a percent of total LSRs received.

Note: This is a measure of completeness not timeliness.  
Source: Master PON File.

- Canceled orders.
- LSRs that were Supplemented prior to confirmation or rejection.
- Edit Rejects (negative 997s) that would not be eligible for confirmation or rejection.

Company:

- CLEC Aggregate
- CLEC Specific

Geography:

- State

**Metric OR-7-01:** 90% threshold for Special Provison.

OR-7-01	% Order Confirmation/Rejects sent within 3 Business Days	
Products	• EDI Orders	
Calculation	Numerator	Denominator
	Total LSR confirmations plus rejections sent within 3 business days of LSR submission.	Total LSRs received during the reporting period.

## 271 Backslide Report

Month

Totals

## 271 Backslide Report

Month

**Totals**

# Bell Atlantic - New York State 271 Backslide Report

Month

Sheet G

## INTERCONNECTION (TRUNKS)

<u>OR</u> <b>Ordering</b>		CLEC	Obs.				Perf. Score	Wgt.	Wgtd. Score
OR-1-12-5020	% On Time Firm Order Confirmations								
OR-1-13-5020	% On Time Design Layout Record								
OR-2-12-5000	% On Time Trunk ASR Reject								
<u>PR</u> <b>Provisioning</b>		BA	BA	CLEC	Observations BA Standard Deviation	Sampling Error	Stat. Score		
PR-4-01-5000	% Missed Appointment - BA - Total								
PR-4-02-5000	Average Delay Days - Total								
PR-4-07-3540	% On Time Performance - LNP only								
PR-5-01-5000	% Missed Appointment - Facilities								
PR-5-02-5000	% Orders Held for Facilities > 15 Days								
PR-6-01-5000	% Installation Troubles w/in 30 Days								
<u>MR</u> <b>Maintenance &amp; Repair</b>									
MR-4-01-5000	Mean Time to Repair - Total								
MR-5-01-5000	% Repeat Reports w/in 30 Days								
<u>NP</u> <b>Network Performance</b>									
NP-1-03-5000	# of Final Trunk Groups Blocked 2 Months								
NP-1-04-5000	# of Final Trunk Groups Blocked 3 Months								
							Totals		

## Collocation

NP	Network Performance	CLEC	Obs.				Perf. Score	Wgt.	Wgtd. Score
NP-2-01-2000	% OT Response to Request for Physical Collocation								
NP-2-02-2000	% OT Response to Request for Virtual Collocation								
NP-2-05-2000	% On Time - Physical Location								
NP-2-06-2000	% On Time - Virtual Location								
NP-2-07-2000	Average Delay Days - Physical								
NP-2-08-2000	Average Delay Days - Virtual								
Totals									

## xDSL Performance Report (Critical Measure 12)

		BA	CLEC	BA	CLEC			
PO-8-01	Manual Loop Qualification							
PO-8-02	Engineering Record Request							
PR-4-14	% Completed on Time							
PR-4-15	% Completed on Time							
PR-4-16	% Completed on Time							
PR-4-17	% Completed on Time							
PR-4-18	% Completed on Time							
PR-6-01-3300	% Installation Troubles - xDSL Loops					Sampling Error	Stat. Score	

"NA" - no activity    "UD" - under development

Month		Bell Atlantic - New York CRITICAL MEASURES - Backside Report	Resale	\$	UNE	\$	Trunks	\$	Collocation	\$	Total	\$
PRE-ORDERING												
1	metric	Response Time OSS Interface	0.0%	0	0.0%	0						0
	PO-1-01	Customer Service Record	X	-	X	-						
	PO-1-02	Due Date availability	X	-	X	-						
	PO-1-03	Address Validation	X	-	X	-						
	PO-1-04	Product and Service Availability	X	-	X	-						
	PO-1-05	Telephone Number Availability and Reservation	X	-	X	-						
	PO-1-06	Facility Availability (Loop Qualification)	X	-	X	-						
2	PO-2-02	OSS Interface Availability - Prime	0%	0	0%	0						0
ORDERING												
3	metric	% On Time Ordering Notification			0%	0						0
	OR-1-02	% On Time LSRC - Flow Through - POTS - 2hrs			X	-						
	OR-1-04	% OT LSRC<10 Lines (Elec.-No Flow Through)-POTS			X	-						
	OR-1-06	% OT LSRC >=10 Lines (Electronic) - POTS			X	-						
	OR-2-02	% On Time LSR Reject - Flow Through - POTS			X	-						
	OR-2-04	% OT LSR Rej.<10 lines (Elec.-No Flow Through)-POTS			X	-						
	OR-2-06	% On Time LSR Reject >= 10 Lines (Electronic) - POTS			X	-						
	OR-4-09	% SOP to Bill Completion Sent w/in 3 Business Days			X	-						
PROVISIONING												
4a	PR-4-01	% Missed Appointment - BA - Total - EEL			0%	0						0
4b		% Missed Appointment	0%	0	0%	0	0%	0				0
	PR-4-01	% Missed Appointment - BA - Total - Specials	X	-	X	-						
	PR-4-01	% Missed Appointment - BA - Total - Trunks					X					
	PR-4-04	% Missed Appointment - BA - Total - Dispatch - POTS	X	-								
	PR-4-04	% Missed Appointment - BA - Total - Dispatch - New Loops			X	-						
	PR-4-05	% Missed Appointment - BA - Total - No Dispatch - POTS	X	-								
5	PR-4-06	% Missed Appt. - BA - No dispatch - Platform			0%	0						0
6		Hot Cut Performance			0%	0						0
	PR-4-06	% On Time - Hot Cut (adj. for missed appts. due to late LSRC)			X	-						
	PR-6-02	% Troubles within 7 Days - Hot Cut			X	-						
7	PR-4-07	% On Time Performance - UNE LNP					0%	0				0
MAINTENANCE												
8		Mean Time To Repair	0%	0	0%	0	0%	0				0
	MR-4-01	Mean Time To Repair - Specials	X	-	X	-						
	MR-4-01	Mean Time To Repair - Trunks					X					
	MR-4-02	Mean Time To Repair - Loop Trouble	X	-	X	-						
	MR-4-03	Mean Time To Repair - Central Office	X	-	X	-						
	MR-4-08	% Out Of Service > 24 Hours - POTS	X	-	X	-						
9		% Repeat Reports within 30 Days	0%	0	0%	0						0
	MR-5-01	% Repeat Reports w/in 30 days - POTS	X	-	X	-						
	MR-5-01	% Repeat Reports w/in 30 days - Specials	X	-	X	-						
NETWORK PERFORMANCE												
10		Final Trunk Group Blocked										
	NP-1-03	Blocked 2 Months						0				0
	NP-1-04	Blocked 3 Months						0				0
11		Collocation							0%	0		0
	NP-2-05/8	% On Time - Physical & Virtual							X	-		
	NP-2-07/8	Average Delay Days - Physical & Virtual							X	-		
Digital Subscriber Line Services												
12		xDSL			0%	0						0
	PO-8-01	Avg. Response Time - Manual Loop Qualification			X	-						
	PO-8-02	Avg. Response Time - Engineering Record Request			X	-						
	PR-4-14	% Completed on Time			X	-						
	PR-4-15	% Completed on Time			X	-						
	PR-4-16	% Completed on Time			X	-						
	PR-4-17	% Completed on Time			X	-						
	PR-4-18	% Completed on Time			X	-						
	PR-6-01	% Installation Troubles - xDSL Loops			X	-						
		# of full share measures in category Total	5	0	10	0		0		0		\$

## Special Provision - UNE Ordering

Month

	% On Time	Observations	Market Adj.
OR-1-04-3100	% OT LSRC<10 Lines (Elec.-No Flow Through)-POTS		
OR-1-06-3320	% On Time LSRC >=10 Lines (Electronic) - POTS		
OR-2-04-3320	% OT LSR Rej.<10 lines (Elec.-No Flow Through)-POTS		
OR-2-06-3320	% On Time LSR Reject >= 10 Lines (Elec.) - POTS		

## Total Market Adj.

\* For allocation, any UNE Ordering market adjustment is combined with the MOE UNE market adjustment allocation.

## Special Provision - UNE Flow Through

PR-5-01-3000 % Flow Through - Total - POTS & Specials				OR-5-03-3112 % Flow Through - Achieved - POTS & Specials			
Month	%	Observations		Month	%	Observations	
		Gross #	Flow-thru			Gross #	Flow-thru
Overall				Overall			

## Market Adjustment \*

\* For allocation, any Flow Through market adjustment is combined with the MOE UNE market adjustment allocation.

## Special Provision - Hot Cut - Loop Performance

		% On Time Current Mo.	Observations	% On Time Prior Month	Observations
PR-9-01-3520	% On Time Performance - Hot Cut				
%Troubles					
PR-6-02-3520	% Installation Troubles within 7 days - Hot Cut				

Tier I (2 mo) Tier II (1 mo) Total

## Market Adjustment \*

\* For allocation purposes, any Hot Cut market adjustment is combined with the Critical measure market adjustment allocation.

## Special Provision - Electronic Data Interface Measures

	% On Time	Observations
OR-9-01	% Missing Notifier Trouble Ticket PONS Cleared within 3 Bus. Days	
	% Reject	Observations
OR-3-02	% Resubmission Rejection	

## Market Adjustment

	% On Time	Observations	Market Adj.
OR-7-01	% Order Confirmation/Rejects sent within 3 Business Days		
	% On Time	Observations	Market Adj.
OR-4-09	% SOP to Bill Completion within 3 Business Days		

Total Market Adj.

## Change Control Assurance Plan

		% On Time	Observations	Mrkt Adj.
PO-4-01	% Change Management Notices sent on Time (type 3,4,5)			\$ -
		Delay Days*		
PO-4-03	Change Management Notice Delay 8 plus Days (type 1-5)			\$ -
	* Gross number of delay days	% Test Deck Wgt. Failure	Test Deck Wgt.	
PO-6-01	% Software Validation			\$ -
PO-7-04	Delay Hours - Failed/Rejected Test Deck Transactions Transactions failed, no workaround			\$ -
Total Market Adjustment				\$ -



# **Bell Atlantic - New York**

## **PAP/CCAP Market Adjustment Summary**

**Month**

**Weighted  
Score**

**Market  
Adjustment**

### **MODE OF ENTRY**

Resale

Unbundled Network Elements

Trunks

Collocation

**Mode of Entry Total**

### **# CRITICAL MEASURES**

- 1 Response Time OSS Interface
- 2 OSS Interface Availability - Prime
- 3 % On Time Ordering Notification
- 4a % Missed Appointment - BA - Total - EEL
- 4b % Missed Appointment
- 5 % Missed Appt. - BA - No dispatch - Platform
- 6 Hot Cut Performance
- 7 % On Time Performance - UNE LNP
- 8 Mean Time To Repair
- 9 % Repeat Reports within 30 Days
- 10 Final Trunk Group Blocked
- 11 Collocation
- 12 xDSL

**Critical Measure Total**

### **SPECIAL PROVISIONS**

UNE Ordering

UNE Flow Through

UNE Hot Cut Loop

EDI Measures

**Special Provision Total**

### **CHANGE CONTROL**

**Grand Total**

# 271 Backslide Market Adjustment Summary - CLEC A

Month						
MODE OF ENTRY	Weighted Score	Market Adjustment	Number of Units in Market	Market Adjust. Rate	Number of Units for CLEC A	Total Market Adjustment for CLEC A
Resale						
Unbundled Network Elements						
Trunks						
Collocation						

TOTAL MOE \$ to CLEC A

\$0

## CRITICAL MEASURES / EDI Special Provision

1	Response Time OSS Interface	Resale
1	Response Time OSS Interface	UNE
2	OSS Interface Availability - Prime	Resale
2	OSS Interface Availability - Prime	UNE
3	% Accuracy LSRC	
4a	% Missed Appointment - BA - Total - EEL	
4b	% Missed Appointment - BA - Total - Specials	Resale
4b	% Missed Appointment - BA - Total - Specials	UNE
4b	% Missed Appointment - BA - Total - Trunks	
4b	% Missed Appointment - BA - Total - Dispatch - POTS	Resale
4b	% Missed Appointment - BA - Total - No Dispatch - POTS	Resale
4b	% Missed Appointment - BA - Total - Dispatch - New Loops	UNE
5	% Missed Appointment - BA - No Dispatch - Platform	
6	% On Time Performance / % Troubles Within 7 Days	Hot Cut
7	% On Time Performance - LNP	
8	Mean Time to Repair - Specials	Resale
8	Mean Time to Repair - Loop Trouble	Resale
8	Mean Time to Repair - Central Office	Resale
8	% Out of Service > 24 Hours - POTS	Resale
8	Mean Time to Repair - Specials	UNE
8	Mean Time to Repair - Loop Trouble	UNE
8	Mean Time to Repair - Central Office	UNE
8	% Out of Service > 24 Hours - POTS	UNE
8	Mean Time to Repair - Trunks	
9	% Repeat Reports within 30 Days - POTS	Resale
9	% Repeat Reports within 30 Days - Specials	Resale
9	% Repeat Reports within 30 Days - POTS	UNE
9	% Repeat Reports within 30 Days - Specials	UNE
10	Final Trunk Group Blocked - 2 Months	
10	Final Trunk Group Blocked - 3 Months	
11	Collocation - % On Time - Physical and Virtual	
11	Collocation - Average Delay Days - Physical and Virtual	
12	Avg. Response Time - Manual Loop Qualification	xDSL
12	Avg. Response Time - Engineering Record Request	xDSL
12	PR-4-14 - % Completed on Time	xDSL
12	PR-4-15 - % Completed on Time	xDSL
12	PR-4-16 - % Completed on Time	xDSL
12	PR-4-17 - % Completed on Time	xDSL
12	PR-4-18 - % Completed on Time	xDSL
12	% Installation Troubles - xDSL Loops	xDSL
	Special Provision - Electronic Data Interface Measures	

TOTAL Critical Measure / EDI Special Provision \$ to CLEC A

\$0

# **CHANGE CONTROL ASSURANCE PLAN**

**BELL ATLANTIC - NEW YORK**

**APRIL 2000**

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### APPENDIX A – Change Control Measures

## **I. INTRODUCTION**

The "Order Adopting Permanent Rule" in Case 97-C-0139 added three new metrics related to the Change Control Process to the Carrier-to-Carrier Guidelines.<sup>1</sup> To ensure that New York Telephone Company, d/b/a Bell Atlantic - New York ("BA-NY"), will execute the Change Control process in an expeditious and non-discriminatory manner, BA-NY will undertake the actions set forth in this Change Control Assurance Plan (the "C.C.A.P.") after entry into the long distance market pursuant to Section 271 of the Telecommunications Act of 1996. A total of \$25 million in bill credits will be at risk to CLECs if BA-NY provides unsatisfactory service for the four measures in this Plan.

## **II. THE CHANGE CONTROL MEASURES AND BILL CREDITS**

The following measures, which have been taken from the June Order, are included in this Plan:

1. PO-4-01: % Change Management Notices Sent on Time;
2. PO-4-03: Change Management Notice Delay 8 plus Days;
3. PO-6-01: % Software Validation; and
4. PO-7-04: Delay Hours - Failed/Rejected Test Transactions - No

Workaround.

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<sup>1</sup> In addition to PO-4 Timeliness of Change Management Notice, which was included in the Guidelines adopted by the Commission in February (see Case 97-C-0139, *Proceeding on Motion of the Commission to Review Service Quality Standards for Telephone Companies*, "Order Adopting Inter-Carrier Service Quality Guidelines" (issued February 16, 1999), the Commission adopted PO-5, Average Notification of Interface Outage, PO-6 Software Validation and PO-7 Software Problem Resolution Timeliness. (See Case 97-C-0139, *Proceeding on Motion of the Commission to Review Service Quality Standards for Telephone Companies*, "Order Establishing Permanent Rule" (issued June 30, 1999) (the "June Order"), Appendix at 8-12.

Attached hereto as Appendix A is a chart that provides the standards that will be applied to each of the above measures and the total amount of bill credits associated with each standard. If a performance measure is missed according to its standards, bill credits will be paid to all CLECs purchasing Unbundled Network Elements ("UNEs") or resold services. CLECs will receive bill credits on a prorated basis of the total credit determined using Appendix A based on their lines in service. This Plan will use the same mechanisms set forth in the Performance Assurance Plan for determining "lines in service." (See C.C.A.P. at 6, n.7.)

Under this Change Control Assurance Plan, BA-NY will retain the right to withdraw any proposed software release prior to the item being put into final production. If BA-NY exercises this right, it will not be deemed to have violated the requirements set forth in PO-4-01, PO-4-03, PO-6-01 or PO-7-04 and will not be subject to the payment of bill credits under those measures.

The initial amount of annual bill credits for all CLECs will be \$10 million under this Plan. If, however, the bill credits due to the CLECs under this Plan exceed \$10 million in any year,<sup>2</sup> an additional amount of \$15 million will be at risk from the bill credit amounts allocated to the Mode of Entry Categories in the Performance Assurance Plan. Thus, a total of \$25 million will be available for bill credits for the Change Control measures. Bill credit payments for Change Control measures will be given priority over bill credits for the MOE categories. (See P.A.P., Section II(B)(2).)

The Commission will have the authority to reallocate the monthly distribution of bill credits between and among any provisions of the P.A.P. and the C.C.A.P. The Commission will

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<sup>2</sup> The "year" will be measured from the first day of BA-NY's entry into the interLATA market.

give the Company 15 days notice prior to the beginning of the month in which the reallocation will occur. Any reallocation will be done pursuant to Commission order.

### **III. MONTHLY REPORTS**

Each month BA-NY will issue a report on its performance on the above measures to each CLEC providing service in New York.<sup>3</sup> The reports will be CLEC specific and will indicate the scores on the measures, the aggregate amount of bill credits, if any, that BA-NY must provide pursuant to the standards set forth in Appendix A, and the specific amount of bill credits that will appear on the individual CLEC's bill. All CLECs with multiple bill accounts must inform BA-NY as to which of their accounts should receive any bill credits for the Change Control measures.

### **IV. REVIEWS, UPDATES AND AUDITS**

Biannual reviews and updates will occur under this Plan until the Commission determines otherwise. However, BA-NY, after consulting with Staff, may at any time recommend to the Commission modifications, additions, or deletions to the measures in this Plan or the bill credit allocations. CLECs and any other interested parties will be given an opportunity to provide comments on any recommendations. In addition, Staff will have the right from time to time, on 60-days notice to BA-NY, to conduct an audit of data reported in the monthly reports.<sup>4</sup>

### **V. EXCEPTION PROCESS**

BA-NY will have the right to file a petition with the Commission seeking to have the standards contained in Appendix A waived or modified either for future or past periods. The

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<sup>3</sup> BA-NY's performance on the other Change Control metrics will be reported in the monthly C2C reports.

<sup>4</sup> Unlike the most of the measures in the P.A.P., the recording of data for each of the measures in this Plan will be done manually.

Commission shall grant such a request if it determines that the application of one or more of the standards contained in Appendix A would not serve the public interest. The application of one or more parts of Appendix A would not serve the public interest if BA-NY could not, through any reasonable efforts, prevent results that do not satisfy the standards. BA-NY's petition must include all information that demonstrates how the measure was missed. It shall also include a recalculation of the measure with the challenged information excluded from the calculations. CLECs and other interested parties will be given an opportunity to respond to any BA-NY petition for an Exception. In the event the Commission rules in BA-NY's favor, BA-NY will have the right to offset any paid bill credits against any future bill credits that may come due for either the Change Control measures or Performance Assurance Plan measures.

#### **VI. TERM OF PLAN FOR THE CHANGE CONTROL PROCESS**

The Change Control Assurance Plan will have the same term as the Performance Assurance Plan. It will remain in effect, as modified from time to time by the Commission, until the Commission rescinds the Performance Assurance Plan or develops a replacement mechanism.

#### **VII. FULLY INTEGRATED DOCUMENT**

The terms and provisions of this Plan are submitted in their entirety to the Commission for approval. This Plan represents a fully integrated statement of the commitments BA-NY will undertake, including the payment of bill credits for unsatisfactory performance under the measures. It is not offered to the Commission for approval on a piecemeal basis.



**Change Control Performance Assurance Plan Measures**

PO-4-01	% Change Management Notices Sent on Time			
	Performance Range (Notification and Confirmation for Types 3, 4 and 5 only)	≥ 95%	90 to 94.9%	< 90%
	Performance Credit	\$0	\$250,000	\$500,000
PO-4-03	Change Management Notice Delay 8 plus Days (Notification and Confirmation for Type 1, 2, 3, 4 and 5)			
	Performance Credit	\$25,000 per day		
PO-6-01	% Software Validation (See Note 1)			
	Performance Range	≤ 5%	5.1 to 10%	> 10%
	Performance Credit	\$0	\$100,000	\$1,000,000
PO-7-04	Delay Hours – Failed/Rejected Test Transactions – No Workaround (See Note 2)			
	Performance Credit	\$50,000 per day Per Release		

Note 1: Measured against releases pursuant to Change Notice Types 3, 4 and 5.

Note 2: PO-7-04 applies to failed Test Deck items executed by BA-NY in PO-6-01 and applies until all errors reported in PO-6-01 are fixed.



# APPENDIX D

**Bruce P. Beausejour**  
Vice President and General Counsel – New England

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Boston, MA 02110-1585

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October 27, 2000

Mary L. Cottrell, Secretary  
Department of Telecommunications & Energy  
Commonwealth of Massachusetts  
One South Station, 2<sup>nd</sup> Floor

**RE: D.T.E. 99-271**

Dear Secretary Cottrell:

Enclosed for filing in the above-captioned proceeding, please find the original of Verizon Massachusetts' Response to Motions for Reconsideration of Performance Assurance Plan.

Thank you for your assistance to this matter.

Very truly yours,

A handwritten signature in cursive script that reads "Bruce P. Beausejour".

Bruce P. Beausejour

Enclosure

cc: Cathy Carpino, Esquire, Hearing Officer  
Michael Isenberg, Esquire, Director - Telecommunications Division  
Attached Service List

**Summary of Revisions  
Massachusetts Performance Assurance Plan  
October 27, 2000**

<b>Change</b>	<b>Section</b>	<b>Page</b>
<b>Added</b> provision for DTE authority to reallocate bill credits.	II.B.2	PAP at 8
<b>Removed</b> footnote regarding statistical scoring of metrics with no volume.	II.C.1	PAP at 10
<b>Added</b> provision to pay CLECs by check if they stop purchasing Verizon MA services.	II.H	PAP at 20
<b>Added</b> provision for the submission to the DTE of changes made to the NY PAP.	II.K.2	PAP at 24
<b>Added</b> statement regarding the review of data reliability in future audits.	II.K.3	PAP at 24
<b>Replaced</b> Critical Measure #3, % Accuracy LSRC, with the seven Ordering Performance metrics. Critical Measure #4B, % Missed Appointment –Complex, has been eliminated and #4C has been renumbered to #4B. Complex Services, originally covered under Critical Measure #4B, are now included in Critical Measure #12, xDSL Performance. (These changes are consistent with the New York PAP.)	App B	App. B at 1
<b>Removed</b> clause referencing minimum volume of 10.	App D.B	App D at 2
<b>Replaced</b> Domain Clustering rule to be consistent with NY plan.	App E.8	App E at 2-3
<b>Revised</b> Change Control Assurance Plan to contain MA specific references.	App I	App I

**Verizon Massachusetts Section 271 of  
The Telecommunications Act of 1996  
Compliance Filing**

Dated: October 27, 2000

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<b>1.</b>	<b>Verizon MA's Compliance Filing Properly Complied With the Department's Requirement To Follow the Performance Benchmarks Adopted in New York</b>	<b>5</b>
<b>2.</b>	<b>The Statistical Scoring and Bill-Credit Methodology for the Massachusetts PAP Is Intended To Be Identical to the New York PAP</b>	<b>7</b>
<b>3.</b>	<b>Verizon MA Has Properly Narrowed the Waiver Provisions in the Massachusetts PAP As Required by the <i>PAP Order</i></b>	<b>7</b>
<b>4.</b>	<b>The Change Control Assurance Plan ("CCAP") for the Massachusetts PAP Complies with the <i>PAP Order</i></b>	<b>8</b>
<b>B.</b>	<b>There Are No Material Differences Between the New York PAP and the Massachusetts PAP</b>	<b>9</b>
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**COMMONWEALTH OF MASSACHUSETTS**  
**DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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Verizon Massachusetts Section 271 of  
The Telecommunications Act of 1996  
Compliance Filing

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D.T.E. 99-271

**RESPONSE OF VERIZON MASSACHUSETTS  
TO MOTIONS FOR RECONSIDERATION  
OF PERFORMANCE ASSURANCE PLAN**

Verizon Massachusetts ("Verizon MA") submits this response to the motions for clarification and reconsideration of AT&T and to the motion for reconsideration of Rhythm's Links, Inc. ("Rhythms") which seek review of certain aspects of the Department's decision of September 5, 2000, adopting a Performance Assurance Plan (the "PAP")<sup>1</sup> for Verizon MA (the "*PAP Order*") and the Department's subsequent approval of Verizon MA's compliance PAP. As discussed below, AT&T's and Rhythms' requests for reconsideration consist of little more than the repetition of claims previously made which the Department explicitly considered and rejected in the *PAP Order*. They provide no basis for reconsideration.

Likewise, AT&T's claim that Verizon MA failed to identify all differences between its proposed PAP and the New York PAP and that the Department was thereby misled in the *PAP Order* is without merit. Although Verizon MA's initial proposal and

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<sup>1</sup> The PAP is a self-executing remedy plan designed to prevent degradation in wholesale service quality provided to competing carriers after Verizon MA gains entry into the long-distance market pursuant to Section 271 of the Telecommunications Act of 1996. *PAP Order* at 1.



compliance filing did not contain some provisions that now are contained in the New York PAP, the Department's rationale for using the New York PAP as a model is not affected by those minor differences. The few differences arose principally because of the timing of decisions and filings in Massachusetts and New York or mere oversight. Since the Department clearly expects that the Massachusetts PAP conform to the New York model, except where the Department specifically decides otherwise, Verizon MA is filing as Attachment A to this Response a revised PAP which eliminates minor differences noted by AT&T.<sup>2</sup> Verizon MA requests that the Department approve Attachment A.

## **I. INTRODUCTION**

On March 28, 2000, the Department issued a Memorandum directing Verizon MA – and inviting other participants in this case – to file proposed comprehensive performance monitoring and enforcement plans. *See* March 28, 2000, Hearing Officers' Memorandum. Verizon MA, AT&T, and WorldCom filed proposed plans on April 25, 2000. A number of participants, including Rhythms, filed comments at that time. Verizon MA's proposed PAP was based on the plan adopted by the New York Public Service Commission and which the Federal Communications Commission ("FCC") found acceptable in ensuring that local telecommunications markets remain open after

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<sup>2</sup> In reviewing AT&T's claims, Verizon MA identified two differences between the Massachusetts and New York PAPs that AT&T does not mention. First, although comparable dollar amounts are at risk for Critical Measure No. 3 in relation to the respective caps, the New York plan spreads the dollars among seven metrics, while the Massachusetts compliance filing has a single metric. Second, Critical Measure No. 4b was eliminated and 4c was renumbered to "4b" to be consistent with the New York plan. Complex service addressed in the original 4b is now covered under Critical Measure No. 12, xDSL Performance. Verizon MA has made these changes in Attachment A. In addition, several typographical errors in the compliance filing have been corrected.